



Tom.Perina@CH2M.com
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To Christopher Lichens/R9/USEPA/US@EPA
cc
bcc
Subject comments on Dave's memo

Chris,

attached are comments on Dave's memo from last week. Please let me know if you have any questions.



Tom Review of CDM prelim draft criteria for evaluating extent of contamination 061405.doc

MEMORANDUM

CH2MHILL

Review Comments on "Preliminary Draft Criteria for Evaluating New Data," Dated June 14, 2005, Prepared by Camp Dresser & McKee, Inc.

TO: Christopher Lichens/USEPA Region IX

FROM: Tom Perina/CH2M HILL, Riverside
Mike Grigorieff/CH2M HILL, Santa Ana

DATE: June 21, 2005

As you requested, CH2M HILL reviewed the memorandum prepared by Camp Dresser & McKee, Inc. (CDM), dated June 14, 2005, and titled *Preliminary Draft Criteria for Evaluating New Data*. CDM prepared the subject document on behalf of the Omega Chemical Site PRP Organized Group (OPOG). The subject memorandum presents the criteria for evaluating additional data with regards to the extent of vadose zone contamination and sources of contamination other than Omega Chemical. The memorandum was prepared in response to review comments made by EPA/CH2M HILL on the initially submitted workplan.

Consistent with the oversight role of the U.S. Environmental Protection Agency (EPA), this technical memorandum presents recommendations and comments that CH2M HILL believes will streamline and improve the project. The goal of this review is to confirm that the approach to the investigation is appropriate and consistent with the goals at this site and is consistent with typical industry practices.

First bullet Revise the text to read: *Soil and groundwater samples will be collected at increasing distances away from the former Omega property. Decreasing contaminant concentrations at similar depths with increasing distance from the property will be taken to indicate the source area lateral extent in that direction.*

Fourth bullet Revise the text to read: *A change in soil contaminant composition with increasing distance from the property that is not explained by degradation or transport characteristics will also be taken as a possible indication of the presence of another source.*

Fifth bullet Revise the text to read: *A change in soil contaminant fingerprint (i.e., ratio of contaminants) with increasing distance from the property that is not explained by degradation or transport characteristics will also be taken as a possible indication of the presence of another source.*

Sixth and seventh bullets Replace "may" by "will....as necessary".